MEYNER AND LANDIS LLP

REPLY TO: CATHERINE PASTRIKOS KELLY, ESO. DIRECT DIAL: (973) 602-3423 CKELLY@MEYNER.COM

ATTORNEYS AT LAW ONE GATEWAY CENTER **SUITE 2500** NEWARK, NEW JERSEY 07102 WWW.MEYNER.COM

February 5, 2020

NEW YORK: 100 PARK AVENUE 16™ FLOOR NEW YORK, NEW YORK 10017

VIA ECF

Hon. Naomi Reice Buchwald United States Courthouse, Courtroom 21A 500 Pearl St. New York, New York 10007-1312

Stewart v. Stewart, Case No. 1:19-cv-05960-NRB

Dear Judge Buchwald:

We represent Michele Stewart ("Defendant") in the above matter. We write a joint letter on behalf of all parties seeking an extension of a deadline included in the Court's Order, dated January 30, 2020 (the "Order"). In the Order, the Court stated that by February 6, 2020, the parties must:

separately file letters setting forth a numbered list of any discovery issues that remain unresolved after the parties have "in good faith conferred or attempted to confer with the person or party failing to make disclosure of discovery in an effort to obtain it without court action." Fed. R. Civ. P. 37(a)(1)[.]

The parties have talked and made progress on their discovery disputes and have narrowed the relevant discovery issues. The parties plan to further discuss the discovery issues tomorrow and, to the extent necessary, on Monday to narrow them even further. Accordingly, the parties respectfully request that the Court extend the deadline in the Order to file letters setting forth the parties' Lamitecentruchur discovery issues from February 6, 2020 to Tuesday, February 11, 2020.

We thank the Court for its consideration.

Respectfully submitted, MEYNER AND LANDIS LLP

Catherine Pastrikos Kelly

Catherine Pastrikos Kelly (CP3300)

cc:

Plaintiff's counsel (via ECF)